

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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CAROL McNEELY, SHILPA VLK,	:	
GEORGE K. BERNHARD, and DEBORAH	:	
JOYCE,	:	
	:	
on behalf of themselves and all others	:	
similarly situated,	:	
	:	
and	:	
	:	
DAVID T. RUDZIEWICZ, FREDERICK	:	
DEMAIO, DONNA R. KOBIELSKI,	:	
DONNA MOLTA, NADINE JOY,	:	
SAMUEL PENTA, and ROLAND HOGG,	:	
	:	
Opt-In Plaintiffs,	:	1:18-CV-00885-PAC
	:	
-against-	:	<i>Electronically Filed</i>
	:	
METROPOLITAN LIFE INSURANCE	:	
COMPANY, METROPOLITAN LIFE	:	
RETIREMENT PLAN FOR UNITED STATES	:	
EMPLOYEES, SAVINGS AND INVESTMENT	:	
PLAN FOR EMPLOYEES OF METROPOLITAN	:	
LIFE AND PARTICIPATING AFFILIATES,	:	
METLIFE OPTIONS & CHOICES PLAN, and	:	
WELFARE BENEFITS PLAN FOR EMPLOYEES	:	
OF METROPOLITAN LIFE AND	:	
PARTICIPATING AFFILIATES,	:	
	:	
Defendants.	:	
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**SUPPLEMENTAL DECLARATION OF STACEY M. GRAY
IN SUPPORT OF PLAINTIFFS' MOTION
FOR FINAL APPROVAL OF CLASS ACTION SETTLEMENT**

I, Stacey Gray, declare upon personal knowledge and under penalty of perjury that the following is true and correct:

1. I make all of the statements below based on personal knowledge, and in some instances after reviewing the firm's records to refresh my recollection as to specific dates and docket entries related to this litigation.

2. I am the founder and principal of Stacey Gray PC ("Gray PC") located in New York, New York. This declaration supplements my previous declaration filed on November 6, 2019 in support of preliminary approval of the proposed settlement in this case.

3. In support of Class Counsel's motion for attorney fees and expenses, we previously submitted evidence that, after the exercise of billing judgment, my services rendered through November 3, 2019 totaled \$441,307.50.

4. I exercised billing judgment again which resulted in just an additional 34.20 hours of work to total \$24,795.00 at the same hourly rate of \$725.00 as before from November 4, 2019 through January 7, 2020.

5. Based on my knowledge and reviewing records, my work between November 4 and January 7 was performed in the following areas:

6. **Class Counsel's Motion for Fees:** I finished Gray PC's declaration for attorney fees and expenses as part of Class Counsel's motion for fees and expenses.

7. **MetLife's New Dental Consultant Agreement:** I contacted opposing counsel because Plaintiffs contacted me about a provision in the contract for dental consultants for the period beginning December 1, 2019 ("New Contract") that arguably would have prevented any dental consultant who signed the contract from participating in the settlement of this lawsuit. We contacted counsel for MetLife who explained that was not intended. We then agreed on the

terms of a communication that MetLife sent to current dental consultants confirming they could both sign the new contract and participate in the settlement. I also responded to concerns about the New Contract expressed by class members.

8. **Unnamed Class Members:** I was contacted by and communicated with five unnamed class members who had questions about their status and rights under the litigation and settlement.

9. **Identification of Home Addresses of Dental Consultants:** Shortly after the Claims Administrator mailed the Notices, I fielded various questions and concerns expressed by dental consultants that the Notices had been sent to some class members at their MetLife office instead of at their home addresses. My co-counsel and I challenged MetLife's position that it lacked home addresses for some class members. Co-counsel and I worked with many of the plaintiffs who searched for and provided home addresses or other contact information for class members.

10. **Final Papers for Approval of Settlement:** I assisted in the preparation of all documents in support of the final approval for settlement to be filed on January 8, 2020.

11. Gray PC's total lodestar from December 17, 2017 through January 7, 2020 is \$466,102.50 for services on this litigation.

12. Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

1/7/2020
Date

/s/ Stacey M. Gray
Stacey M. Gray